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January 7, 2022

Via ECF

Hon. James L. Garrity, Jr.
US Bankruptcy Court
One Bowling Green
New York, NY 10004-1408

Re: Genever Holdings LLC - Case No. 20-12411-JLG

Dear Judge Garrity:

I write to further update the Court as to status in advance of the conference scheduled for January 11, 2022.

This morning we filed the Debtor's Plan and Disclosure Statement. The plan was circulated among the various creditors, and reflects comment from the Sales Officer, The Sherry Netherlands, and Bravo Luck. We have not received comments from Douglas Spelfogel, Esq., who is still reviewing the document on behalf of PAX, but in light of the expiration of exclusivity today, we are filing the documents subject to later amendment as may be necessary. By copy of this letter, I am also forwarding a copy of the Plan and Disclosure Statement to Richard Morrissey, Esq., and he likely will have comments as well.

I received a request from Chambers earlier this week for a correction on the proposed Order for the appointment of Serene Boardman of Sotheby's as the designated real estate broker selected by the Sales Officer. I understand that Chambers is now reviewing the corrected order.

We will update the Court further next week at the conference.

Respectfully yours,

/s/ J. Ted Donovan

cc: Richard Morrissey, Esq.
Douglas Spelfogel, Esq.
Francis Lawall, Esq.
Melanie Cyganowski, Esq.
Aaron Mitchell, Esq.
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